

EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
(BEAUMONT DIVISION)**

TRACY K. BARKER and GALEN D. BARKER,

Plaintiffs,

vs.

**HALIBURTON COMPANY d/b/a KBR
KELLOGG BROWN & ROOT, KELLOGG
BROWN AND ROOT SERVICES
CORPORATION, INC., KBR TECHNICAL
SERVICES, INC., ALI MOKHTARE, SERVICE
EMPLOYEES INTERNATIONAL, INC., AND
THE UNITED STATES OF AMERICA,**

Defendants.

CASE NO.: 1:07 CV 0294

AFFIDAVIT OF ALI MOKHTARE

“My name is Ali MOKHTARE. I am at least 21 years of age, of sound mind, fully competent to make this affidavit, and am personally acquainted with the facts herein stated.

1. Beginning in or about 1990, I began working for the United States Department of Defense working as a systems engineer. In 2003, I joined the United States Department of State, serving in a supervisory capacity as a Chief Scientist. Over the course of the next two years, I twice volunteered to serve in Iraq to support the operations of the Department of State.

2. In March of 2004, I traveled to Iraq to serve as a Farsi translator during the interview of detainees. This assignment lasted for about two months. Later in 2004, I was asked to return to Iraq, this time to serve as the Deputy Regional Coordinator of United States Embassy activities in the Basrah region. In this capacity I had supervisory responsibilities for the career service and foreign service employees of the Department of State assigned to Basrah. I served as Deputy Regional Coordinator from approximately December 2004 until December 2005.

3. I am a naturalized United States citizen residing at 405 Ayr Hill Avenue, N.E., Vienna, in the Commonwealth of Virginia. At no point in my career did I reside in the Eastern District of Texas or any other judicial district in the state of Texas. In fact, I have never maintained a residence in the state of Texas, nor do I have an interest in, use or possess any real or personal property or any asset, located in Texas. I currently do not and have never done business in the State of Texas.

4. I became acquainted with Tracy Barker when we were both in Baghdad, Iraq and Basrah, Iraq. I had not met and did not know Ms. Barker prior to that time.

5. I am currently not and have never been an employee of Halliburton Company, or its various subsidiaries, KBR Kellogg Brown & Root, Kellogg Brown & Root Services Corporation, Inc., and KBR Technical Services, Inc., (collectively "KBR"). I am currently not and have never been an employee of Service Employees International, Inc. ("SEIU").

6. I have never entered into any legal agreements, including employment and consulting agreements, on behalf of Halliburton, KBR, or SEII, nor have I been a party to any such agreements.”

7/23/2007
Date

A. Mokhtar
Ali Mokhtare

DISTRICT OF COLUMBIA: SS

Subscribed and sworn to before me on this 23rd day of July 2007.

Melanie L. Radcliff
Notary Public
My commission expires: 7/31/2007

Melanie L. Radcliff
Notary Public, District of Columbia
My Commission Expires 07-31-2007